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Additional Counsel on Signature Page

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re LYFT INC. SECURITIES LITIGATION

MASTER FILE NO. 4:19-CV-02690-HSG

This Document Relates to:

ALL ACTIONS

**JOINT STIPULATION AND
[PROPOSED] ORDER DESIGNATING
THE SECOND AMENDED
CONSOLIDATED CLASS ACTION
COMPLAINT AS THE OPERATIVE
COMPLAINT**

1 Pursuant to Local Rule 7-12, Defendants Lyft, Inc., Logan Green, John Zimmer, Brian
2 Roberts, Prashant (Sean) Aggarwal, Jonathan Christodoro, Ben Horowitz, Valerie Jarrett, David
3 Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes Wilderotter (“Defendants”) and Lead
4 Plaintiff Rick Keiner (“Lead Plaintiff,” and together with Defendants, the “Parties”), through
5 their counsel, submit the following Joint Stipulation and [Proposed] Order Designating the
6 Second Amended Consolidated Class Action Complaint as the Operative Complaint.

7 WHEREAS, on April 16, 2020, Lead Plaintiff filed the Consolidated Amended Class
8 Action Complaint for Violations of Federal Securities Laws (“First Amended Complaint”) (ECF
9 No. 74);

10 WHEREAS, on September 30, 2021 Lead Plaintiff filed his Notice of Motion and Motion
11 for Leave to File [Proposed] Second Amended Class Action Complaint and Memorandum of
12 Points and Authorities in Support Thereof (ECF No. 206) (the “Motion for Leave”);

13 WHEREAS, concurrently with filing the Motion for Leave, Lead Plaintiff filed his
14 [Proposed] Second Consolidated Amended Class Action Complaint for Violations of Federal
15 Securities Laws (the “Second Amended Complaint”) (ECF Nos. 205-5 (unredacted), 206-2
16 (redacted));

17 WHEREAS, the Motion for Leave was fully briefed as of January 18, 2022 (ECF Nos.
18 230, 237) and scheduled for a hearing on February 3, 2022;

19 WHEREAS, on January 27, 2022 the Court vacated the hearing scheduled for February 3,
20 2022 and took the Motion for Leave under submission (ECF No. 239);

21 WHEREAS, on February 8, 2022 the Parties notified the Court that they had reached an
22 agreement in principle to settle this action (ECF No. 240);

23 WHEREAS, on February 10, 2022, the Court terminated the Motion for Leave as moot
24 (ECF No. 242);

25 NOW, THEREFORE, the Parties hereby stipulate, subject to Court approval, that for the
26 purposes of effectuating the proposed settlement as described in the forthcoming Stipulation and
27 Agreement of Class Action Settlement, the parties designate the Second Amended Complaint as
28 the operative complaint in this action, unless and until the occurrence of any event that would

cause the termination of the proposed settlement pursuant to Section 3.10 of the Stipulation and Agreement of Class Action Settlement.

Stipulated and agreed to by:

Date: June 16, 2022

BLOCK & LEVITON LLP

/s/ Jeffrey C. Block

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FILER'S ATTESTATION

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of the document has been obtained from all of the signatories above.

Dated: June 16, 2022

/s/ Jeffrey C. Block
Jeffrey C. Block

* * *

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: _____

HONORABLE HAYWOOD S. GILLIAM, JR.
U.S. DISTRICT JUDGE